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11 *Corporation, Inc.)*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 ROLANDA BROWN,

15 Plaintiff,

16 vs.

17 EQUIFAX INFORMATION SERVICES, LLC,  
18 a Georgia limited liability company;  
19 WEBBANK, a foreign corporation; 1<sup>st</sup>  
20 HERITAGE CREDIT, a foreign company; and  
21 CONN CREDIT CORPORATION, INC., a  
22 foreign corporation,

23 Defendants.

Case No.: 2:19-cv-01455-GMN-BNW

24 **JOINT MOTION TO EXTEND TIME TO**  
25 **RESPOND TO COMPLAINT (FIRST**  
26 **REQUEST)**

27 Plaintiff, Rolanda Brown (“Plaintiff”), and Defendant, Conn Appliances, Inc. (“Conn”)  
28 (collectively the “Parties”), by and through their counsel of record, hereby move as follows:

On August 21, 2019, Plaintiff filed her Complaint [ECF No. 1]. Conn received Plaintiff’s  
Complaint by certified mail on October 9, 2019, in an envelope postmarked September 25, 2019.  
On November 6, 2019, Plaintiff filed a Proof of Service showing that Conn had been served at its  
registered agent on October 9, 2019. Conn’s answer or responsive pleading was due on October  
30, 2019. However, the parties have been actively engaged in settlement discussions and request  
that this party extend the time for Conn to respond to the Complaint to December 2, 2019.

WHEREAS, the Parties hereby move this court to set the deadline for Conn to file its  
responsive pleading as December 2, 2019. Conn agrees to participate and attend any Rule 26(f)

1 conference that occurs during the pendency of the extension.

2 This is the first request for extension of time for Conn to file its response to Plaintiff's  
3 Complaint. The parties request this extension in order to continue discussing possible resolution.  
4 The extension is requested in good faith and is not for purposes of delay or prejudice to any other  
5 party.

6 DATED this 21<sup>st</sup> day of November, 2019.

7  
8 WRIGHT, FINLAY & ZAK, LLP

9 /s/ Ramir M. Hernandez

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/s/ Frances Arenas

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19 **IT IS SO ORDERED**

20 **DATED: November 22, 2019**

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24 **BRENDA WEKSLER**  
25 **UNITED STATES MAGISTRATE JUDGE**  
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